



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

August 8, 2017

By Hand & Via ECF

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: **United States v. Ahmad Khan Rahimi,**  
**16 Cr. 760 (RMB)**

Dear Judge Berman:

The Government respectfully submits the materials on the enclosed disc in response to the Court's August 7, 2017 Order. (Dkt. No. 110). The materials on the disc are arranged in numbered folders corresponding to the following paragraph numbers, and the descriptions below contain reference to the relevant portions of the Government's July 13, 2017 Motions *In Limine* ("Govt MILs")<sup>1</sup> to which they relate:

1. Selected Internet activity by the defendant in 2015 and 2016 relating to jihad and *Dabiq*, a propaganda publication by the Islamic State of Iraq and al-Sham ("ISIS"), (see Govt MILs at 3);
2. Selected images relating to jihad-themed nasheeds that were stored on the Laptop that was seized from the defendant's home in Elizabeth, New Jersey on September 19, 2016 (see Govt MILs at 4);
3. 15 issues of *Inspire* Magazine that were stored on the Laptop (see Govt MILs at 5);
4. The document titled "The Book of Jihad" that was stored on the Laptop (see Govt MILs at 5);<sup>2</sup>
5. Selected images relating to instructions for making explosives involving ammonium nitrate, hexamethylene triperoxide diamine ("HMTD"), and

---

<sup>1</sup> The Government respectfully incorporates by reference the defined terms from its Motions *In Limine*. All such terms used herein have the meaning established in the prior submission.

<sup>2</sup> The same document was attached to the July 22, 2012 email that was attached as Exhibit C to the Government's Motions *In Limine*.

- triacetone triperoxide (“TATP”), which were stored on the Laptop (*see* Govt MILs at 5);
6. YouTube videos from the links in the defendant’s January 7, 2012 email, to the extent still available on the Internet (*see* Govt MILs Ex. B)
  7. A video seized from the cellphone of Relative-1, which shows the defendant testing bomb components in the backyard of his home in Elizabeth on September 15, 2016 (*see* Govt MILs at 4);
  8. Additional video reflecting the same test of bomb components by the defendant in the backyard of his home in Elizabeth on September 15 (*see* Govt MILs at 4);
  9. Video reflecting the defendant exiting his home in Elizabeth twice at approximately 5:00 a.m. on September 17, 2016, first with a white garbage bag containing the Seaside Devices, and then with bags containing the 23rd Street, 27th Street, and Elizabeth Devices (*see* Govt MILs at 11);<sup>3</sup>
  10. Two images seized from the defendant’s iCloud account reflecting driving instructions from Elizabeth to the Sawmill Cafe in Seaside Park, New Jersey (*see* Govt MILs at 12);
  11. Videos and license-plate image captures reflecting the BMW used by the defendant on September 17: (i) entering the Garden State Parkway, southbound, at the Raritan South Toll Plaza at approximately 5:30 a.m., and (ii) exiting the Garden State Parkway near Toms River at approximately 6:05 a.m. (*see* Govt MILs at 12);
  12. Video reflecting the defendant near his home in Elizabeth at approximately 10:45 a.m. on September 17 (*see* Govt MILs at 12);
  13. Video reflecting the defendant—with the Fanny Pack holding the Glock and ammunition that he later used to try to kill members of the Linden PD strapped diagonally across his chest—tossing keys to a relative inside the restaurant connected to his home in Elizabeth at approximately 5:00 p.m. on September 17 (*see* Govt MILs at 12);
  14. Videos reflecting the defendant in and around New York Penn Station at approximately 6:30 p.m. on September 17—after having traveled across the New York-New Jersey border, *i.e.*, in Interstate commerce—with the bomb-laden luggage containing the 23rd Street, 27th Street, and Elizabeth Devices (*see* Govt MILs at 12);

---

<sup>3</sup> Specifically, the 23rd Street Device was concealed in a dark-colored duffle bag with wheels, the 27th Street Device was concealed in a lighter-colored duffle bag with wheels, and the Elizabeth Devices were concealed in a backpack.

Very truly yours,

By: /s/  
 Emil J. Bove III  
 Shawn G. Crowley  
 Andrew J. DeFilippis  
 Nicholas J. Lewin  
 Assistant United States Attorneys

Cc: Defense Counsel  
(For pickup)